

# EXHIBIT D



IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JOHN NOAKES,

Plaintiff,

v.

CASE WESTERN RESERVE UNIVERSITY,  
*et al.*,

Defendants.

) Case No. 1:21-cv-01776

) Judge Pamela A. Barker

) **DECLARATION OF DR. MARJORIE**  
) **GREENFIELD**

Dr. Marjorie Greenfield, of full age, declares as follows:

1. I am currently employed by Case Western Reserve University (“CWRU” or the “University”) as the Assistant Dean in the Office of Student Affairs, Dean of the Geiger Society, Vice Chair of Faculty Development, and Professor within the Departments of Reproductive Biology and Pediatrics within CWRU’s School of Medicine. I have served as Assistant Dean in the Office of Student Affairs and Dean of the Geiger Society since around ~~2016~~ <sup>2017</sup>.

2. I am over 21 years of age and have personal knowledge of the facts and other information set forth in this Declaration based upon my employment in the roles of Assistant Dean in the Office of Student Affairs, Dean of the Geiger Society, Vice Chair of Faculty Development, and Professor within the Departments of Reproductive Biology and Pediatrics within CWRU’s School of Medicine and/or my review of relevant records kept in the normal course of business.

3. I began serving as Society Dean and advisor to [REDACTED] (referred to in this Declaration as “John Noakes” or “Mr. Noakes”) in or around April 2021.

4. As outlined in the School of Medicine Student Handbook, Society Deans serve as advisors and mentors to medical students, helping students navigate the curriculum and providing



students with advice and support for residency and career planning. Society Deans provide personal advising and support student wellness, as well as provide academic and career advising.

5. As Mr. Noakes' Society Dean, I would meet with him regularly to discuss his experience in medical school and to provide advice and guidance on personal, academic, and career matters.

6. In or around July 2021, during one of my meetings with Mr. Noakes, he told me that he had received a fantastic offer to work at a start-up company for one year, and he was considering taking a year off of medical school to pursue the opportunity.

7. Several weeks later, Mr. Noakes told me that he decided not to take a year off, but that he would continue his second year of medical school in the Fall 2021 semester.

8. During one or two of our regular check in meetings in the late summer, Mr. Noakes discussed interactions he had in classes and/or around campus with [REDACTED] (referred to in this Declaration as "Jane Roe" or "Ms. Roe"). He explained that he and Ms. Roe both complained to CWRU's Office of Equity regarding alleged violations of a no-contact directive between the two of them. Mr. Noakes was concerned that he would inadvertently violate the no-contact directive or do something that would jeopardize his medical school education. I encouraged Mr. Noakes to disengage from Ms. Roe, and to focus on his studies instead.

9. I never tried to force him into taking a year off of medical school – to accommodate Ms. Roe or for any other reason.

10. I never threatened Mr. Noakes with disciplinary action or disciplinary proceedings, if he did not follow my advice.

11. I never threatened Mr. Noakes with disciplinary action or disciplinary proceedings, if he filed a Title IX complaint with the Office of Equity.



12. I never told Mr. Noakes that bad things would happen if he engaged with the Office of Equity or otherwise participated in Office of Equity investigations or proceedings.

13. I have no role in the Office of Equity investigations into Title IX complaints.

14. I am not a member of the Professionalism Working Group.

15. I am not a voting member of the Committee on Students.

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Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: October 6, 2021

  
MARJORIE GREENFIELD

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